

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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THERESA ROMANO, L.R. BLAKE	)	
TRUST, and Concetta Romano,	)	CA No. 03-12626-MLW
Plaintiffs	)	
	)	
v.	)	
	)	
ARBELLA MUTUAL INSURANCE CO.,	)	
Defendants	)	

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**PLAINTIFFS', THERESA ROMANO, LR BLAKE TRUST, AND CONCETTA ROMANO, MOTION TO CONTINUE HEARING RE: DEFENDANT'S MOTION FOR SUMMARY JUDGMENT AND PLAINTIFFS' OPPOSITION THERETO**

Now come the Plaintiffs, Theresa Romano, L.R. Blake Trust, and Concetta Romano, in the above-captioned proceeding, and respectfully request that this Honorable Court continue the hearing on the Defendant's Motion for Summary Judgment, and Plaintiffs' Opposition thereto, from Tuesday, September 14, 2004, to Thursday, September 16 or Friday, September 17, 2004. As grounds therefor, the Plaintiffs state as follows:

1. That Stephen Hrones, lead counsel to the Plaintiffs, commenced trial on Tuesday, September 7, 2004, in the matter of *Commonwealth v. Fredrick Lomberto*, Norfolk County Superior Court Criminal Indictment Nos. NOCR01-0547-001-011, a retrial of a rape case which ended in a hung jury in January, 2004, and which is expected to last through Friday, September 24, 2004;
2. That due to the Jewish Holidays, the Superior Court will be in recess on Thursday, September 16 and Friday, September 17, 2004; and, that in light of the recess, attorney Hrones will be available to appear for the Plaintiffs on either of those days;

3. That the Defendant's counsel, Nicholas A Kenney, is available to appear and therefore assents to this Motion to Continue the Hearing to Thursday, September 16 or Friday, September 17, 2004.

WHEREFORE, the Plaintiffs respectfully request that this Honorable Court grant their Motion to Continue the Hearing to September 16 or 17, 2004.

Respectfully submitted,  
The Plaintiffs Theresa Romano, *et al.*,  
By their attorneys,

//S//Austin J Freeley  
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//S//Stephen Hrones  
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**CERTIFICATE OF SERVICE**

I, Stephen Hrones, hereby certify that, on this 10th day of September, 2004, I have served a true and correct copy of the foregoing PLAINTIFFS', THERESA ROMANO, LR BLAKE TRUST, AND CONCETTA ROMANO, MOTION TO CONTINUE HEARING RE: DEFENDANT'S MOTION FOR SUMMARY JUDGMENT AND PLAINTIFFS' OPPOSITION THERETO, where unable to do so electronically, by United States First-Class Mail, postage prepaid, as follows: Lewis C Eisenberg, Esq., Nicholas A Kenney, Esq., COSGROVE EISENBERG & KILEY, 803 Hancock St, POB 189, Quincy, MA 02170.

//S//Stephen Hrones  
Stephen Hrones